

1 LATONIA SMITH
2 9748 CANYON LANDING AVE.
3 LAS VEGAS, NV 89166
4 725-203-2455
5 PLAINTIFF IN PROPER PERSON

6
7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
OCT 28 2019	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY:	DEPUTY

10 LATONIA SMITH,

11 Plaintiff(s),

12 -vs-

13 CASE NO. 2:19-cv-00856-GMN-NJK

14 CAESARS ENTERTAINMENT

15 CORPORATION, a Delaware corporation;

16 PHWLV, LLC d/b/a PLANET HOLLYWOOD

17 RESORT AND CASINO, a Nevada limited

18 liability company; SHANNON PIERCE;

19 ETHAN THOMAS

20 Defendant(s).

21
22
23
24
25
26
27
28 **OBJECTIONS AND MOTION FOR NEW REVIEW**

29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
990
991
992
993
994
995
996
997
998
999
1000
1001
1002
1003
1004
1005
1006
1007
1008
1009
1000
1001
1002
1003
1004
1005
1006
1007
1008
1009
1010
1011
1012
1013
1014
1015
1016
1017
1018
1019
1010
1011
1012
1013
1014
1015
1016
1017
1018
1019
1020
1021
1022
1023
1024
1025
1026
1027
1028
1029
1020
1021
1022
1023
1024
1025
1026
1027
1028
1029
1030
1031
1032
1033
1034
1035
1036
1037
1038
1039
1030
1031
1032
1033
1034
1035
1036
1037
1038
1039
1040
1041
1042
1043
1044
1045
1046
1047
1048
1049
1040
1041
1042
1043
1044
1045
1046
1047
1048
1049
1050
1051
1052
1053
1054
1055
1056
1057
1058
1059
1050
1051
1052
1053
1054
1055
1056
1057
1058
1059
1060
1061
1062
1063
1064
1065
1066
1067
1068
1069
1060
1061
1062
1063
1064
1065
1066
1067
1068
1069
1070
1071
1072
1073
1074
1075
1076
1077
1078
1079
1070
1071
1072
1073
1074
1075
1076
1077
1078
1079
1080
1081
1082
1083
1084
1085
1086
1087
1088
1089
1080
1081
1082
1083
1084
1085
1086
1087
1088
1089
1090
1091
1092
1093
1094
1095
1096
1097
1098
1099
1090
1091
1092
1093
1094
1095
1096
1097
1098
1099
1100
1101
1102
1103
1104
1105
1106
1107
1108
1109
1100
1101
1102
1103
1104
1105
1106
1107
1108
1109
1110
1111
1112
1113
1114
1115
1116
1117
1118
1119
1110
1111
1112
1113
1114
1115
1116
1117
1118
1119
1120
1121
1122
1123
1124
1125
1126
1127
1128
1129
1120
1121
1122
1123
1124
1125
1126
1127
1128
1129
1130
1131
1132
1133
1134
1135
1136
1137
1138
1139
1130
1131
1132
1133
1134
1135
1136
1137
1138
1139
1140
1141
1142
1143
1144
1145
1146
1147
1148
1149
1140
1141
1142
1143
1144
1145
1146
1147
1148
1149
1150
1151
1152
1153
1154
1155
1156
1157
1158
1159
1150
1151
1152
1153
1154
1155
1156
1157
1158
1159
1160
1161
1162
1163
1164
1165
1166
1167
1168
1169
1160
1161
1162
1163
1164
1165
1166
1167
1168
1169
1170
1171
1172
1173
1174
1175
1176
1177
1178
1179
1170
1171
1172
1173
1174
1175
1176
1177
1178
1179
1180
1181
1182
1183
1184
1185
1186
1187
1188
1189
1180
1181
1182
1183
1184
1185
1186
1187
1188
1189
1190
1191
1192
1193
1194
1195
1196
1197
1198
1199
1190
1191
1192
1193
1194
1195
1196
1197
1198
1199
1200
1201
1202
1203
1204
1205
1206
1207
1208
1209
1200
1201
1202
1203
1204
1205
1206
1207
1208
1209
1210
1211
1212
1213
1214
1215
1216
1217
1218
1219
1210
1211
1212
1213
1214
1215
1216
1217
1218
1219
1220
1221
1222
1223
1224
1225
1226
1227
1228
1229
1220
1221
1222
1223
1224
1225
1226
1227
1228
1229
1230
1231
1232
1233
1234
1235
1236
1237
1238
1239
1230
1231
1232
1233
1234
1235
1236
1237
1238
1239
1240
1241
1242
1243
1244
1245
1246
1247
1248
1249
1240
1241
1242
1243
1244
1245
1246
1247
1248
1249
1250
1251
1252
1253
1254
1255
1256
1257
1258
1259
1250
1251
1252
1253
1254
1255
1256
1257
1258
1259
1260
1261
1262
1263
1264
1265
1266
1267
1268
1269
1260
1261
1262
1263
1264
1265
1266
1267
1268
1269
1270
1271
1272
1273
1274
1275
1276
1277
1278
1279
1270
1271
1272
1273
1274
1275
1276
1277
1278
1279
1280
1281
1282
1283
1284
1285
1286
1287
1288
1289
1280
1281
1282
1283
1284
1285
1286
1287
1288
1289
1290
1291
1292
1293
1294
1295
1296
1297
1298
1299
1290

1 Plaintiff's "received" documents are carefully documented upon receipt and none of the
 2 prior judges (thus far) sent any orders to Plaintiff concerning this case to allow Plaintiff
 3 to review and comment if necessary. This disreputable Court is actively withholding
 4 correspondence from Plaintiff and engaging in ex parte communications with
 5 defendants, which is judicial/attorney ethics violations. And just as another example of
 6 this fact, Plaintiff received correspondence from the deplorable Fugazzi on October 26,
 7 2019 about a twelve-page order that he got from the dishonorable Youchah. Plaintiff
 8 never received any such twelve-page correspondence from this lady, and it is evident
 9 that defendants and the Court are engaging in ex parte communications/having side
 10 communications about the case without Plaintiff, which is also not shocking given that
 11 this Court is just another arm of defendants' defense team. The Court is also getting
 12 confused with their own docket and correspondence, which is just another prime reason
 13 why Plaintiff has opposed any combination of the cases and has motioned for this case
 14 to be returned to the correct jurisdiction—Eighth Judicial District Court—under Judge
 15 Jerry Wiese (whenever this judiciary gets their heads from out of their own piss filled
 16 toilets).

18 As a preliminary matter, Plaintiff objects to white judges¹, like the ignoble Koppe,
 19 overseeing this case as they are, simply, psychologically incapable of any type of
 20 unbiased decisions as evidenced in their own biased writings and unilateral
 21 correspondence with defendants. Specifically, this third, new, corrupt judge's orders,
 22 denying Plaintiff's stay and granting an unserved stay motion by defense illustrate that
 23 she is mentally incapable of being impartial and handicapped by the same white
 24 supremacist mentality held by vile whites in this country. As another preliminary matter,
 25 Plaintiff also requested that any motions in this case be set for hearing so, even still,

26
 27
 28 ¹ And, yes, Plaintiff is highly sick of you old, out-of-touch, racist, pathetic, white judges in
 this entire district.

1 Plaintiff could have responded to any of defense's unserved assertions in Court. One
2 cannot respond to unserved papers.

3 The truth is that Koppe and this court simply don't want to remand Plaintiff's case
4 so that Plaintiff can proceed in the case as they are actively assisting defendants, which
5 is why Koppe and this Court have continued to tend to other things and other decisions,
6 such as writing a myriad of letters to Plaintiff stating (one in particular) that they would
7 not hear Plaintiff's emergency motion for remand and, most recently, that they do not
8 agree with Plaintiff's motion to stay proceedings, while sitting on Plaintiff's uncontested
9 motion to remand which encapsulates a single issue—the racist ban of Plaintiff from a
10 public establishment—that was brought specifically pursuant to the Nevada Revised
11 Statutes. And, the only reason why this Court has still held on to this case so
12 defendants can uphold such a ban is because it is mostly filled with the same white
13 supremacists that instituted the ban in the first place. Quite frankly, this KKK Kangaroo
14 Court has no rights to this case.

16 Moreover, Plaintiff objects to the dishonorable NJK's order issued granting the
17 defendant Shannon Pierce's stay for discovery because, again, Plaintiff did not receive
18 any such motions from Shannon Pierce nor any correspondence on such a motion in
19 this case. Hence, Plaintiff cannot respond to unreceived motions. Again, Plaintiff's
20 receipt of documents from defense are carefully documented, no such documents were
21 received from parties, and defense has purposefully failed to send Plaintiff motions in
22 the past (and even worse lie about sending the motion while taking a picture of the
23 motion still in their possession as an exhibit...idiots). Although Plaintiff motioned for the
24 case to be stayed pending the predictable and imminent remand to state court of the
25 action, Plaintiff has not received/read any arguments presented in defense's motion to
26 stay discovery in order to respond to any such arguments. Further, Plaintiff disagrees
27 with NJK's logic in reaching the decision for defendants' motion and the basis on which
28

1 she reached the decision (at least as stated in the order she sent to Plaintiff; she may
2 have communicated differently with defendants since it is known that this Court is
3 engaging in ex parte communications). Due to the fact that Plaintiff's case belongs in
4 State Court and the fact that this court has no jurisdiction over Plaintiff's case, NJK's
5 ruling that discovery should be stayed pending a ruling on defendants' motions to
6 dismiss is erroneous. The motion to remand was made first (in the very early stage of
7 this litigation), defendants did not properly oppose the motion, and as such any
8 "decisions" made by NJK are based on a resolution of Plaintiff's Motion to Remand,
9 which is dispositive in and of itself (every court of appeals that has considered the
10 question of remand has held that a remand motion is treated as dispositive). In other
11 words, defendants' motions to dismiss are irrelevant given the facts of this case
12 (specifically, that Plaintiff's lawsuit is valid—defendants committed defamation, amongst
13 other things, and abuses of the legal system for which there are remedies under the
14 law; they are not covered by any protections simply because of career titles and
15 certainly not when misconduct is evident—and defendants' removal of the case was
16 erroneous as Plaintiff's claims are all state claims and Plaintiff chose the correct
17 venue/jurisdiction to handle such claims). For the love of god would you people cease
18 your stalling antics and remand the case back so that Plaintiff no longer has to deal with
19 you animals concerning this case.

20
21 The Court is very well aware of the fact that they have no jurisdiction over
22 Plaintiff's case but chooses to hold on to Plaintiff's case for their own selfish, unethical
23 reasons (again, another reason why this court has continued to write other
24 correspondences without remanding Plaintiff's case).

25
26 Plaintiff objects to the dishonorable NJK's order issued denying Plaintiff's motion
27 to stay proceedings because her logic/judgment is simply erroneous, clearly clouded by
28 bias (because she does not want to admit that Plaintiff was correct in seeking a stay

1 pending a remand, which should be ordered first and should have been ordered a long
2 time ago, but chose to issue a stay pending defendants' motion to dismiss...they are
3 both dispositive and Plaintiff's motion for remand is likely to be more successful than
4 defendants motions to dismiss which should not even be heard in this district court), and
5 contradicted by case law (*Mark Pierce v. Atlantic Specialty Insurance* 1:16-cv-00829-
6 JAP-KBM; 215). In fact, NJK refuses to stay proceedings so she can continue tending to
7 other items/making unethical rulings while sitting on Plaintiff's remand motion and
8 holding onto Plaintiff's case so that defendants can continue to delay and derail this
9 case. Plaintiff's request to stay proceedings is based on the issue of venue and
10 jurisdiction, which are indeed grounds for a stay of proceedings as it is dispositive of the
11 case in the Federal Court system and many courts in the Ninth Circuit has made this
12 ruling (as just one example above)

14 Furthermore, the Ninth Circuit's rationale and holdings clearly indicate that
15 Plaintiff's case should have been remanded immediately. There are no valid arguments
16 for removal and this Court's holding of Plaintiff's case so that she cannot proceed in
17 court is a clear violation of Plaintiff's rights. It is evident that this Court is assisting
18 defendants just by their very own actions. "The existence of federal jurisdiction on
19 removal must be determined from the face of the plaintiff's complaint." *Salveson v. W.*
20 *States Bankcard Ass'n*, 731 1423, 1426-27 (9th Cir. 1984). There cannot be any doubts
21 as to whether jurisdiction exists (*Gaus v. Miles, Inc.*, 980 F.2d 564, 566 (9th Cir. 1992)).
22 ("Underlying these principles is the rationale that a *plaintiff should be free to frame and*
23 *pursue his theory of pleading*, especially if the claim could be either or both state and
24 *federal.*" *Id.* (quoting *The Fair v. Kohler Die & Specialty Co.*, 228 U.S. 22, 25 (1913))
25 (emphasis added). Specifically, reiterated, there are no issues as to which Court holds
26 jurisdiction (it's clearly not this one). Plaintiff's claim against CEC/PHWLV's ban was
27 pursuant to the specified Nevada Revised Statutes laid out therein and Plaintiff filed her
28

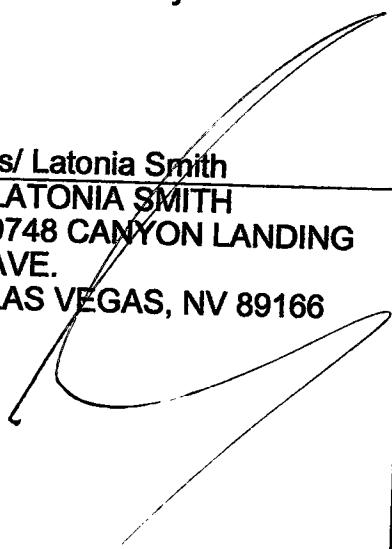
1 lawsuit in State Court, not Federal. The removal was clearly unwarranted and used as a
2 delay tactic by defendants. Plaintiff reserves all rights to seek

3 Further since this court and defendants have issues with providing
4 correspondence to Plaintiff and the Court only provides correspondence to defense
5 (unsurprisingly), Plaintiff requests that all correspondence be available for Plaintiff to
6 pick-up from the clerk on Mondays and/or that all correspondence be sent via certified
7 mail for Plaintiff's signature upon receipt because you are all, quite frankly, in the same
8 business of lying and corruption. **Plaintiff will be seeking correspondence on this**
9 **issue in particular as it is a prejudice to Plaintiff for the Court to engage in ex-**
10 **parte communications/ provide communications to defendants sans Plaintiff, to**
11 **rule on motions that have not been served, and to issue orders and only serve**
12 **them to defendants. As such, Plaintiff requests a new review and hearing on all**
13 **motions/orders in this case.**

15 Thank you for your time and attention to Plaintiff's objections to be preserved for
16 review by a panel other than yourselves. You are all full of shit. Sincerely.

17 Dated this 26th day of October 2019

19 .
20 /s/ Latonia Smith
21 LATONIA SMITH
22 9748 CANYON LANDING
23 AVE.
24 LAS VEGAS, NV 89166
25
26
27
28



CERTIFICATE OF SERVICE

I certify that I am serving a true and correct copy of the OBJECTIONS on the parties set forth below by:

—
placing an original or true copy thereof in a sealed envelope with the correct
prepaid postage affixed for collection and mailing in the United States Mail, at
Las Vegas, Nevada.

X Certified Mail, Return Receipt Requested of the document(s) listed above to the person(s) at the address(es) set forth below

E-service

Personal delivery through a process server of the document(s) listed above to the person(s) at the address(es) set forth below

Riley Clayton

HALL JAFFE & CLAYTON, LLP

7425 Peak Drive

Las Vegas NV 89128

702-316-4111

rclayton@lawhic.com

Alex Eugazzi and Michael Rausch

SNELL AND WILMER

3883 Howard Hughes Parkway • Suite 1100

as Vegas, NV 89106

702-784-5200

flugazzi@swfw.com

nnaretti@swlaw.com

/s/ Latonia Smith

Plaintiff, In Proper Person